



## Department of Justice

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20 FEB 2006

FILE No:
DOC:
MARS/PRISM:

Gavin Jones  
Director  
Adjudication Branch  
Australian Competition and Consumer Commission  
PO Box 1199  
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Dear Mr Jones 

COMMUNITY CARE UNDERWRITING AGENCY APPLICATIONS FOR REVOCATION  
AND SUBSTITUTION A90997 & A90998

Thank you for your letter dated 6 January 2006, seeking Consumer Affairs Victoria's comments on the request for revocation and authorisation made by the Community Care Underwriting Agency (CCUA). Consumer Affairs Victoria has consulted with the Department of Treasury and Finance and Sport and Recreation Victoria in consideration of this issue.

The services provided by CCUA have been significant in contributing to the availability of affordable insurance to Not-For-Profit Organisations (NFPOs) during a period when NFPO's were facing difficulties in obtaining affordable public liability insurance cover.

Conditions in the insurance market have changed since the ACCC originally granted authorisation to the CCUA. Accordingly, Consumer Affairs Victoria is confident that the ACCC will consider carefully the rationale behind authorisation of the CCUA under current market conditions, to ensure that authorisation is an appropriate, and necessary, supply side response, which justifies the potential diminution in competition arising from the CCUA arrangement.

Yours Sincerely



David Cousins  
Director

